

KEKER & VAN NEST LLP
JOHN KEKER - # 49092
jkeker@kvn.com
PAULA L. BLIZZARD - # 207920
pblizzard@kvn.com
THOMAS E. GORMAN - # 279409
tgorman@kvn.com
633 Battery Street
San Francisco, CA 94111-1809
Telephone: 415 391 5400
Facsimile: 415 397 7188

PROSKAUER ROSE LLP
Bradley I. Ruskin (*pro hac vice*)
bruskin@proskauer.com
Eleven Times Square
New York, NY 10036
Telephone: 212-969-3000
Facsimile: 212-969-2900

PROSKAUER ROSE LLP
Scott P. Cooper (SBN 96905)
scooper@proskauer.com
Sarah Kroll-Rosenbaum (SBN 272358)
skroll-rosenbaum@proskauer.com
Jennifer L. Roche (SBN 254538)
jroche@proskauer.com
Shawn S. Ledingham, Jr. (SBN 275268)
sledingham@proskauer.com
2049 Century Park East, 32nd Floor
Los Angeles, CA 90067-3206
Telephone: 310-557-2900
Facsimile: 310-557-2193

Attorneys for Defendants
OFFICE OF THE COMMISSIONER OF BASEBALL,
an unincorporated association doing business as Major League
Baseball; and ALLAN HUBER "BUD" SELIG

JOSEPH W. COTCHETT (SBN 36324)
jcotchett@cpmlegal.com
PHILIP L. GREGORY (SBN 95217)
pgregory@cpmlegal.com
FRANK C. DAMRELL, JR (SBN 37126)
fdamrell@cpmlegal.com
ANNE MARIE MURPHY (SBN 202540)
amurphy@cpmlegal.com
COTCHETT, PITRE & McCARTHY, LLP
840 Malcolm Road
Burlingame, California 94010
Telephone: (650) 697-6000
Facsimile: (650) 692-3606

Attorneys for Plaintiffs
THE CITY OF SAN JOSE; THE CITY OF
JOSE, AS SUCCESSOR AGENCY TO THE
REDEVELOPMENT AGENCY OF THE
CITY OF SAN JOSE; and THE SAN JOSE
DIRIDON DEVELOPMENT AUTHORITY

EXHIBIT C-1

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA / SAN JOSE DIVISION

CITY OF SAN JOSÉ; CITY OF SAN
JOSÉ AS SUCCESSOR AGENCY TO
THE REDEVELOPMENT AGENCY OF
THE CITY OF SAN JOSÉ; and THE SAN
JOSÉ DIRIDON DEVELOPMENT
AUTHORITY,

Plaintiffs,

v.

OFFICE OF THE COMMISSIONER OF
BASEBALL, an unincorporated association
doing business as Major League Baseball;
and ALLAN HUBER "BUD" SELIG,

Defendants.

Case No. 13-CV-02787-RMW

**JOINT STIPULATION AND
ORDER TO FURTHER EXTEND ADR
DEADLINE**

Judge: Hon. Ronald M. Whyte

Date Filed: June 18, 2013

Trial Date: None set

1 Plaintiffs City of San Jose, City of San Jose as successor agency to the Redevelopment
 2 Agency of the City of San Jose, and the San Jose Diridon Development Authority (collectively
 3 “San Jose” or “Plaintiffs”) and Defendants the Office of the Commissioner of Baseball and Allan
 4 H. Selig (collectively “MLB” or “Defendants”) (collectively, the “Parties”), jointly submit this
 5 Joint Stipulation and Proposed Order to Extend ADR Deadline.

6 WHEREAS, on June 18, 2013, the Court assigned this matter to the Alternative Dispute
 7 Resolution (ADR) Multi-Option Program (*see* Dkt. 4);

8 WHEREAS, the Court recently issued an Order dismissing several of the claims brought
 9 by Plaintiffs (*see* Dkt. 41);

10 WHEREAS, Counsel for the Parties have met and conferred and agree that it would not be
 11 productive to engage in one of the ADR procedures at this point in time to resolve the remaining
 12 disputes in this matter;

13 IT IS HEREBY STIPULATED that the deadline to file a Stipulation to ADR Process or
 14 Notice of Need for ADR Telephone Conference is hereby extended until such date to be
 15 determined by the Court at an appropriate time later in the action.

16
 17 Dated: November 12, 2013

KEKER & VAN NEST LLP

18
 19 By: /s/ John Keker

JOHN KEKER
 PAULA L. BLIZZARD
 THOMAS E. GORMAN

20
 21 Attorneys for Defendants
 22 OFFICE OF THE COMMISSIONER OF
 23 BASEBALL,
 24 an unincorporated association doing
 25 business as Major League
 26 Baseball; and ALLAN HUBER “BUD”
 27 SELIG
 28

1 Dated: November 12, 2013


COTCHETT, PITRE & MCCARTHY, LLP

2
3 By: /s/ Joseph W. Cotchett
JOSEPH W. COTCHETT
4 PHILIP L. GREGORY
FRANK C. DAMRELL, JR.
5 ANNE MARIE MURPHY

6 Attorneys for Plaintiffs
CITY OF SAN JOSE; CITY OF SAN
7 JOSE AS SUCCESSOR AGENCY TO
THE REDEVELOPMENT AGENCY OF
8 THE CITY OF SAN JOSE; and THE SAN
JOSE DIRIDON DEVELOPMENT
9 AUTHORITY

10
11 IT IS SO ORDERED.

12 DATED: FCF/H


13 The Honorable Ronald M. Whyte
14 Judge of the Northern District of California